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ATTORNEYS FOR SCOTT M. SEIDEL,
TRUSTEE OF GOODMAN NETWORKS, INC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	
	§	Chapter 7
GENESIS NETWORKS TELECOM	§	
SERVICES, LLC,	§	Case No. 24-50224 (MMP)
	§	
Debtor.	§	

**SCOTT M. SEIDEL’S, TRUSTEE OF GOODMAN NETWORKS, INC., JOINDER TO
MOTION OF FEDEX SUPPLY CHAIN LOGISTICS & ELECTRONICS, INC. FOR
ORDER DIRECTING RULE 2004 EXAMINATIONS OF (I) THE DEBTOR, (II)
ENDEAVOR MANAGED SERVICES, INC., (III) SYMBIONT VENTURES, LLC F/K/A
GOODMAN INVESTMENT HOLDINGS LLC AND (IV) JAMES GOODMAN**

TO THE HONORABLE MICHAEL M. PARKER, U.S. BANKRUPTCY JUDGE:

COMES NOW Scott M. Seidel (“Seidel”), solely in his capacity as the duly-appointed chapter 7 trustee of Goodman Networks, Inc. (“GNI”), and files this joinder (the “Joinder”) to the *Motion of FedEx Supply Chain Logistics & Electronics, Inc. for Order Directing Rule 2004 Examinations of (I) the Debtor, (II) Endeavor Managed Services, Inc., (III) Symbiont Ventures, LLC f/k/a Goodman Investment Holdings LLC and (IV) James Goodman* [Docket No. 63] (the “Motion”) in support of which Seidel would respectfully show as follows:

1. Seidel hereby joins in the Motion for substantially the reasons as set out in the Motion. GNI is currently a chapter 7 debtor in bankruptcy case number 22-31641 pending in the

bankruptcy court for the Northern District of Texas, for which Seidel is the duly-appointed trustee. The Examinees (as defined in the Motion) are all relevant entities and persons of interest to GNI's pending bankruptcy case. Further, and more relevantly, the Examinees are either the direct recipients or the ultimate beneficiaries of a string of transfers that stripped numerous entities affiliated with James Goodman, of which Genesis Networks Telecom Services, LLC (the "Debtor") and GNI are two, with little transparency. GNI currently holds a claim against the Debtor for funds transferred by GNI for the benefit of the Debtor at James Goodman's direction.

2. Accordingly, for the reasons set out in the Motion and this Joinder, the Motion should be granted.

WHEREFORE, PREMISES CONSIDERED, Seidel respectfully requests that the Court enter an order: (i) granting the Motion; (ii) ordering the Rule 2004 Examinations; (iii) ordering the Examinees to fully produce responsive documents to the requests for production attached to the Motion within thirty (30) days; and (iv) granting all such other and further relief as may be appropriate.

RESPECTFULLY SUBMITTED this 7th day of August, 2024.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina
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**ATTORNEYS FOR SCOTT M. SEIDEL,
TRUSTEE OF GOODMAN NETWORKS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on August 7th, 2024, a true and correct copy of the foregoing document was served via the Court's ECF notification system on all parties entitled to notice thereby, including counsel for the Debtor, and via US Mail first class, postage prepaid, upon the following:

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San Antonio, TX 78230

Symbiont Ventures, LLC
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San Antonio, TX 78232

Symbiont Ventures, LLC
c/o Capitol Corporate Services, Inc., Registered Agent
1501 S Mopac Expy, Ste. 220
Austin, TX 78746

Endeavor Managed Services, Inc.
1354 N Loop 1604 E
San Antonio, TX 78232

Endeavor Managed Services, Inc.
c/o Incorporating Services, Ltd.
3610-2 N. Josey, Suite 223
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James Goodman
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By: /s/ Conor White
Conor P. White, Esq.